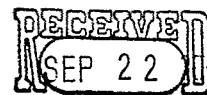


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September 22, 2000



VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED

Docket Coordinator, Headquarters
United States Environmental Protection Agency
U.S. EPA CERCLA Docket Office, 5201G
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

Re: Proposal to add Portland Harbor, Oregon to the National Priorities List

To Whom It May Concern:

Our client, Time Oil Co., operates a petroleum storage and distribution terminal within the Portland Harbor study area, at 10350 North Time Oil Road in Portland, Oregon. Time Oil is not opposing EPA's proposal to add Portland Harbor to the National Priorities List. Time Oil is, however, concerned about statements within the HRS Documentation Record that "up to 17 industrial operations have been identified as potential sources of contamination." (HRS Documentation Record, pp. 1, 49). As EPA is aware, the Oregon Department of Environmental Quality has to date identified 53 industrial facilities, in addition to a number of City of Portland outfalls, that may potentially be associated with constituents identified in Portland Harbor sediments. See "Portland Harbor Site Updates" (DEQ Online). DEQ's site discovery work is ongoing. Time Oil encourages EPA to support thorough site discovery in Portland Harbor so that all sources of contamination to Portland Harbor are identified and controlled and so that investigation and any necessary remediation costs may be spread fairly among all potentially responsible parties.

Thank you for your consideration of these comments.

Sincerely,

Patricia M. Dost

PMD:mkb

cc: Richard Gordon, Time Oil Co.
Kevin Murphy, Time Oil Co.

PORTLAND OREGON 503 222-9981
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